

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Chrystina Amelotti, :  
Plaintiff, :  
v. : No. 23-1222  
Drexel University, et al., :  
Defendants. :

## JOINT STIPULATIONS

1. Ms. Amelotti worked for Drexel from January 2013 to June 2022.
2. Ms. Amelotti was initially hired by Drexel as a Police Officer.
3. Ms. Amelotti worked as a Police Officer from 2013 to 2019.
4. Ms. Amelotti was qualified for the Police Officer position.
5. In 2019, Ms. Amelotti was promoted to Sergeant.
6. Ms. Amelotti worked as a Sergeant from 2019 until June 2022.
7. As a Sergeant, Ms. Amelotti was supervised by Defendant Patrick Haney (Captain) and Defendant Eileen Behr (Chief of Police).
8. During her employment with Drexel, Ms. Amelotti became pregnant with and delivered two children.
9. Ms. Amelotti was out on leave from February 18, 2019 to August 19, 2019.
10. Ms. Amelotti gave birth to her son, which was her first child, on June 2, 2019.
11. In May 2021, Ms. Amelotti became pregnant with her second child.
12. Ms. Amelotti gave birth to her daughter on February 2, 2022.
13. Ms. Amelotti was out on leave for her second leave from July 25, 2021 until May 15, 2022.
14. On May 16, 2022, Ms. Amelotti returned to work at Drexel.
15. Ms. Amelotti separated from employment with Drexel on June 21, 2022.

Respectfully submitted,

/s/ Jeremy M. Cerutti

---

Jeremy M. Cerutti, Esquire  
Karpf, Karpf & Cerutti, P.C.  
Eight Neshaminy Interplex  
Suite 210  
Trevose, PA 19053  
Attorney for Plaintiff

/s/ Kathy Kirkpatrick

---

Kathy Kirkpatrick, Esquire  
Tucker Law Group, LLC  
Ten Penn Center  
1801 Market Street, Suite 2500  
Philadelphia, PA 19103  
Attorneys for Defendants

DATED: June 2, 2025